

Page 5 of 7
Appln. No. 09/863,120
Amendment

REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested. Claims 14-18 have been cancelled. Therefore, claims 1-13 remain pending in the application.

Claim Rejections under 35 U.S.C. § 101

The Examiner has rejected claims 14-18 under 35 U.S.C. §101. Applicants have cancelled claims 14-18 rendering the rejection moot.

Claim Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1-18 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,847,712 to Salesin et al. ("Salesin et al."). Applicants respectfully traverse these rejections.

Salesin et al. discloses a method of drawing a detailed still image. Additional shading lines can be added to the still images to add detailed strokes texture that is difficult for a user to add. More specifically, Salesin et al. describes a technique to allow a user to draw still objects, such as house, realistically with ease.

Alternatively, the apparatus of claim 1, for example, creates a simple moving image by vibrating a line drawing image. The present embodiment creates animation of a line drawing image. There is no suggestion to provide line drawing vibration in Salesin et al. Alternatively, Salesin et al. only describes shading of still objects. Shading is not vibration and is not related to vibration. One skilled in the art would not contemplate vibrating line drawing image pieces, nor understand how line drawing images could be vibrated in light of Salesin et al. Further, Salesin et al. only describes

Page 6 of 7
Appln. No. 09/963,120
Amendment

still images, and does not describe animation of the image. Therefore, Salesin et al. does not teach or suggest at least vibrating line drawing image pieces or means for imparting vibration to each line drawing image piece.

The Examiner references column 11, lines 60-64 to try and demonstrate where Salesin et al. teaches a means for imparting vibration. However, column 11, lines 60-64 describes "test candidate strokes" for generating a texture. Further, the cited section refers to FIG. 3B and the drawing of texture lines 40, not vibrating. There is no suggestion that the texture lines would impart vibration. Further, these "test candidate strokes" are only included in the still drawing once a length of a test candidate stroke passes "a minimum length" criteria. This testing of potential texture lines is not vibration and would not lead to vibration. Salesin et al. only describes generating texture on a still image at column 11, lines 60-64 and fails to teach or suggest vibration.

As such, Applicants submit that the rejection of claims 1 should be withdrawn. Independent claims 6 and 9 include claim language similar to claim 1 with respect to imparting vibrations to line drawing image pieces, and thus are also not anticipated by Salesin et al. for at least the reasons provide above for claim 1. Similarly, the rejections of the claims that depend upon independent claims 1, 6 and 9 should also all be withdrawn for at least the same reasons.

No Fees Believed to be Due

No fees are believed to be due to file this amendment.

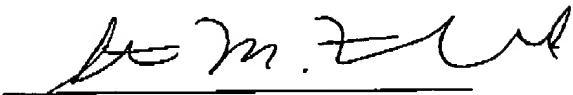
Page 7 of 7
Appln. No. 09/863,120
Amendment

CONCLUSION

Applicant submits that the above amendments and remarks place the pending claims in a condition for allowance. Therefore, a Notice of Allowance is respectfully requested. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone Richard E. Wawrzyniak at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,

Date: 06/22/04



Steven M. Freeland
Reg. No. 42,555
Attorney for Applicant(s)

Address all correspondence to:

FITCH, EVEN, TABIN & FLANNERY
Richard E. Wawrzyniak
120 So. LaSalle Street, Ste. 1600
Chicago, IL 60603
Tel.: (858) 552-1311
Fax: (858) 552-0095